

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST LITIGATION

Case No. 18-cv-01776 (JRT-HB)

This Document Relates To:
ALL ACTIONS

**AFFIDAVIT OF JOHN REININGER
IN SUPPORT OF MOTION FOR
PROTECTIVE ORDER
CONCERNING *EX PARTE* LAWYER
COMMUNICATIONS**

John Reininger deposes and states as follows:

1. I am the Chief Relationship Officer for Clemens Family Corporation.
2. I am identified publicly on Clemens website alongside my current title at <https://clemensfoodgroup.com/our-company/our-legacy-of-pork/family-business-to-business-family>. My public LinkedIn profile also identifies that I am a current officer of Clemens.
3. On the afternoon of August 28, 2019, I received a missed call and voicemail from an unrecognized telephone number.
4. The voicemail stated:

Hi Mr. Reininger. My name is Matt Isaacs. I'm a researcher looking into the pork industry. I've seen that you worked with pork companies for awhile. Please give me a call back as soon as you can. My number is 510-725-3043. That's 510-725-3043. Not selling anything, just wanted to ask you a few quick questions. Please give me a call. Thanks a lot. Bye Bye.
5. I returned the call approximately an hour and a half after receiving it. Mr. Isaacs answered.

6. During the approximately two-minute call that followed, Mr. Isaacs never:

- asked me for my place of employment;
- asked whether I was represented;
- identified himself as an employee of a law firm;
- identified himself as interested in this litigation;
- informed me that I was entitled to have my own counsel present; or
- informed me that I had a right to refuse to be interviewed.

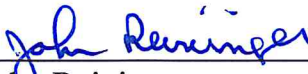
7. Mr. Isaacs asked me questions related to my experience with hog farming.

At one point, he indicated he was particularly interested in speaking with individuals who had worked on a farm between 2009 and 2013. He also asked if I knew anyone else that had worked on hog farms.

8. When I attempted to ask Mr. Isaacs what exactly it was that he was looking for, he was vague in his answers, and indicated he was just trying to gain some general information about the industry.

Pursuant to 28 USC § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 10, 2019



John Reininger